

MICHAEL ANTHONY HERNANDEZ
CA Bar No. 234579
Michael@DefenseAttorneySD.com
Michael Anthony Hernandez, APC
501 West Broadway, Suite 1360
San Diego, CA 92101
Telephone: 619.341.3149
Attorney for Maria Mandujano Sanchez (admitted pro hac vice)

JACQUELINE TIRINNANZI, ESQ.
NV Bar No. 13266
jackie@tirinnanzilaw.com
2370 Corporate Circle Drive, Suite 190
Henderson, Nevada 89074
Telephone: 702.912.3834
Local Counsel and
Attorney for Maria Mandujano Sanchez

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA
2:21-cr-00226-GMN-NJK

**STIPULATION AND ORDER
TO CONTINUE SENTENCING FOR
CONSOLIDATED CASES**

Maria Mandujano Sanchez, by and through counsel of record Michael Anthony Hernandez and Jacqueline Tirinnanzi, and the United States of America, by and through Assistant United States Attorney Allison Reese, hereby stipulate and request that the Court vacate Ms. Mandujano Sanchez's sentencing hearing currently set for May 9, 2023, at 9:00 a.m. and continue it to a later date convenient to the Court, but no sooner than twenty-one (21) days. This stipulation is made and based upon the following:

1. The parties agree to the continuance.

2. On March 2, 2022, Ms. Mandujano Sanchez pleaded guilty to one count of Importation of a Controlled Substance (cocaine) in violation of 21 U.S.C. §§ 952 and 960. ECF No. 15. Sentencing in this case is currently scheduled for May 9, 2023 at 9 a.m.
3. On June 27, 2022, as the result of an unopposed motion (ECF No. 21), this Court issued an order granting the consolidation of the matter in Case No. 2:21-cr-00226-JCM-NJK into the instant case. Case No. 2:21-00226-JCM-NJK; ECF No. 68 and Case No. 2:21-cr-00328-GMN-DJA-1; ECF No. 22
4. On December 6, 2022 Ms. Mandujano Sanchez pleaded guilty to one count of Conspiracy to Distribute a Controlled Substance in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii), and 846 in Case No. 2:21-cr-00226-GMN-NJK. ECF No. 89. Sentencing is also scheduled for May 9, 2023, at 9 a.m. ECF No. 95.
5. Defense counsel's ability to effectively and thoroughly explore all factors relevant to Ms. Mandujano Sanchez's mitigation and sentencing presentation requires a modest amount of additional time to prepare. Counsel are utilizing expert services in preparation for sentencing and the expert requires additional time for preparation of their report. As a curtesy, defense counsel will provide said report to the government so they can determine whether a counter expert report will be offered, also requiring additional time prior to sentencing.
6. Additionally, Mr. Hernandez, who is representing Ms. Mandujano pro hac vice on the importation portion of the case, has scheduling conflicts on the current date. He also resides out of state and travel to Las Vegas is challenging for him with the current sentencing date.
7. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim.

P. 32(b)(2), which states that, “the court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).

8. This is the fourth request for a continuance of the sentencing in Case No. 2:21-cr-00328-GMN-DJA and the second request for a continuance of sentencing in case No. 2:21-cr-00226-GMN-JCA. The additional time requested herein is not sought for purposes of delay. No further continuances are anticipated.

9. Denial of this request for a continuance would deny counsel for Ms. Mandujano Sanchez sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

10. Ms. Mandujano Sanchez is in custody and agrees to the proposed continuances.

Dated May 4, 2023.

/s/ Allison Reese

ALLISON REESE, ESQ.

Assistant U.S. Attorney

/s/ Michael Anthony Hernandez

MICHAEL ANTHONY HERNANDEZ, ESQ.

Counsel for Maria Mandujano Sanchez

/s/ Jacqueline Tirinnanzi

JACQUELINE TIRINNANZI, ESQ.

Counsel for Maria Mandujano Sanchez

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,
Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA
2:21-cr-00226-GMN-NJK

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FINDINGS OF FACT

1. The parties agree to the continuance.
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1 amount of additional time to prepare. Counsel are utilizing expert services in preparation
2 for sentencing and the expert requires additional time for preparation of their report. As a
3 curtesy, defense counsel will provide said report to the government so they can determine
4 whether a counter expert report will be offered, also requiring additional time prior to
5 sentencing.

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7 6. Additionally, Mr. Hernandez, who is representing Ms. Mandujano pro hac vice on the
8 importation portion of the case, has scheduling conflicts on the current date. He also
9 resides out of state and travel to Las Vegas is challenging for him with the current
10 sentencing date.

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12 7. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim.
13 P. 32(b)(2), which states that, “the court may, for good cause, change any time limits
14 prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not
15 implicate or undermine the defendant’s speedy trial rights under the United States
16 Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).

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18 8. This is the fourth request for a continuance of the sentencing in Case No. 2:21-cr-00328-
19 GMN-DJA and the second request for a continuance of sentencing in case No. 2:21-cr-
20 00226-GMN-JCA. The additional time requested herein is not sought for purposes of
21 delay. No further continuances are anticipated.

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23 9. Denial of this request for a continuance would deny counsel for Ms. Mandujano Sanchez
24 sufficient time to effectively and thoroughly prepare for sentencing, taking into account
25 due diligence. Accordingly, a denial of this request for continuance could result in a
26 miscarriage of justice.

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28 10. Ms. Mandujano Sanchez is in custody and agrees to the proposed continuances.

CONCLUSION OF LAW

For all the above-stated reasons, the ends of justice are served by granting the requested continuance for the following reasons: Additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016). Failure to grant the continuance would deny parties sufficient time to meaningfully continue to prepare for sentencing, considering the exercise of due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

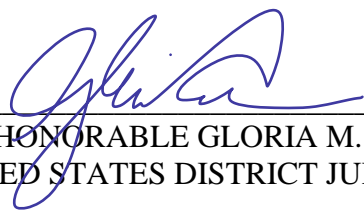
CASE NO. 2:21-cr-00328-GMN-DJA
2:21-cr-00226-GMN-NJK

ORDER

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Ms. Mandujano Sanchez's sentencing hearing set for May 9, 2023, hereby is, VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for May 31, 2023, at the hour of 2 PM in courtroom 7D.

Dated this 5 day of May 2023.



THE HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE